UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE MEADOWBROOK INSURANCE GROUP, INC. SHAREHOLDER LITIGATION	Lead Case No. 5:15-cv-10057-JCO-MJH (Consolidated with No. 5:15-cv-10497-JCO-RSW)
This Document Relates To: ALL ACTIONS.	

NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on April 7, 2016 at 10:00 a.m. Plaintiffs[1] Chaile Steinberg, Gabby Klein, and David Raul, individually and on behalf of the Settlement Class, by and through their attorneys, Robbins Arroyo LLP and Morgan & Morgan, P.C., will move the U.S. District Court for the Eastern District of Michigan, Southern Division, Courtroom 1, 200 E. Liberty Street – Ann Arbor, Michigan 48104, for an Order to: (1) consider whether the Settlement Class should be certified permanently, for purposes of settlement only, and determine whether Plaintiffs Steinberg, Klein, and Raul should be finally appointed as Class Representatives, and their counsel, Robbins Arroyo and Morgan & Morgan should

[1] Unless otherwise noted, all capitalized terms shall have the same definitions as set forth in the Stipulation of Settlement (the "Stipulation") filed on October 23, 2015. ECF No. 19-5.

be finally appointed as Class Counsel; (2) determine whether the Court should finally approve the Settlement as fair, reasonable, and adequate and in the best interests of the Settlement Class, and whether the Order and Final Judgment, submitted herewith, should be entered; (3) determine that the Notice was disseminated in accordance with the Scheduling Order and that notice was given in full compliance with each of the requirements of Rule 23(e) of the Federal Rules of Civil Procedure and due process; (4) approve the agreed-to fee and expense award to Plaintiffs' Counsel; (5) hear and determine any objections to the Settlement and to final certification of the Settlement Class, if any; and (6) consider any other matters that the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiffs shall rely upon the accompanying Memorandum of Law, the Declaration of Stephen J. Oddo, and the Stipulation with Exhibits.

Dated: March 17, 2016

ALLEN BROTHERS,
ATTORNEYS AND COUNSELORS,
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Executive Committee for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2016, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send electronic notices of same to all counsel of record.

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